

REMARKS

I. PRELIMINARIES

Applicant respectfully thanks the Examiner for performing a thorough search. Applicant also respectfully thanks the Examiner for withdrawing the previous rejection under 35 USC § 112.

Claims 1 and 10 are independent. Claims 4-9, 13 and 16-18 depend on one of the independent claims and thus incorporate that which is recited therein.

Claims 1 and 10 are amended herein for clarity. Claims 2-3, 11-12 and 14-15 have been cancelled. Hence, Claims 1, 4-10, 13 and 16-18 are pending in the Application. No new matter is added herein.

II. INFORMATION DISCLOSURE STATEMENT

Applicant thanks the Examiner for acknowledging Applicant's Information Disclosure Statement (IDS) mailed on January 17, 2007. Applicant respectfully requests consideration of the IDS mailed on February 6, 2007 and the IDS mailed on February 12, 2007.

III. ISSUES RELATING TO ALLEGED PRIOR ART

Claims 1, 4-10, 13 and 16-18 are rejected under 35 USC § 102(b) over US Patent Application Publication No. 2003/0014394 to Fujiwara, et al. (hereinafter Fujiwara). Applicant respectfully traverses the rejection.

A rejection under §102 is traversed if the claims recite one or more features, elements, steps or limitations that are not found in the cited reference. Stated another way, the cited reference must teach or disclose each and every feature of the claims, arranged as in the claims. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983). As shall be explained hereinafter, claims of the present application contain features not found in the reference, and therefore the rejection is overcome.

Claims 1 and 10 recite managing access to data. Present Claims 1 and 10 expressly recite registering, with a database server, a user defined policy function to associate with at least two columns of two tables. Registering the user defined policy function causes the database server to generate database metadata that associates the policy function with the at least two columns in the at least two tables. Based on the metadata, the database server detects that a query references the at least two columns. In response to detecting that the query references the at least two columns, the database server invokes the policy to generate a condition expression returned by the policy function. The database server rewrites the query by creating a modified query to incorporate the condition expression, based on the database query. The policy function registered is only used for

queries that reference all of the at least two columns.

Various distinguishing features of claims 1 and 10 are not suggested in any way much less disclosed by the cited art. Therefore, the cited art fails to teach of the features of claims 1 and 10.

Among these distinguishing features are features of the policy function, as claimed. First, a policy function must be associated with at least two columns. Further, the policy function is only invoked for a query that references at least two columns with which the policy function is associated. On the other hand, in Fujiwara the masking function is mapped to only one column. See the Table II, paragraph 0072 therein. The masking function is used to rewrite a query when a query references the single column mapped to the masking function.

Second, the policy function is a function that returns an expression that is incorporated into a query. The policy function (i.e. a reference to it) is not incorporated in the query; rather its output is incorporated. On the other hand, the masking function of Fujiwara is itself incorporated into a rewritten query.

The Office Action alleges that Applicant does not define "how the user defined policy functions that return expressions are differed with the user defined function returns a value for a column" (*sic*; Office Action at p. 6 ¶ 3). Applicant respectfully disagrees. Claims 1 and 10 explicitly recite such a feature. Applicant also notes that in the same paragraph the Office Action admits the masking function is incorporated into the rewritten query.

Another distinguishing feature, as explained in the response to the previous Office Action, is that claims 1 and 10 explicitly recite that a database server rewrites the query. The present Office Action alleges that Fujiwara describes such a feature, i.e., query rewriting in a database server, based on Fujiwara, at p. 3, ¶ 0041, stating that a single computer system may host three server components: the database server, a report server and a web server. Id. at p. 6 ¶ 1. Applicant respectfully but strenuously disagrees; this allegation is incorrect.

For instance, database, computing, client-server technology and related artisans of ordinary skill are aware that a database server is a specifically-tasked combination of integrated software components and an allocation of computational resources (such as memory and processes) for executing the integrated software components on a processor, in which the combination of the software and computational resources are used to manage a particular database, such as by governing and facilitating access to a database by processing queries from clients to access data stored therein. Indeed, a database server may be implemented on one or more conventional computer systems. However, while a database server can be implemented on a single computer,

which may indeed also host other software based components and applications, the database server remains its own distinct, if not wholly independent entity.

Moreover, even in a hypothetical instance in which the database server shares one or more hardware components with one or more other servers, the software and other defining characteristics of the database server are wholly functionally distinct therefrom. Thus, the instant allegation in the Office Action (Id.) is incorrect from the perspective of a database, computing, client-server technology and related artisan of ordinary skill. Thus, Fujiwara wholly fails to describe the feature of queries rewritten with a database server, as claimed herein. For yet this additional reason Claims 1, 4-10, 13 and 16-18 are allowable over the reference under 35 USC § 102.

Based on at least the three rationales discussed above, Claims 1, 4-10, 13 and 16-18 are allowable over Fujiwara under 35 USC § 102. Applicant respectfully requests reconsideration.

IV. CONCLUSIONS AND MISCELLANEOUS

For the reasons set forth above, all of the pending claims are now in condition for allowance. Applicant believes that a Notice of Allowance is thus next in order and most earnestly requests formal issuance of same. The Examiner is respectfully invited to contact the undersigned by telephone or other convenient medium relating to any issue that would advance examination of the present application.

Applicant believes this reply to be timely. Nevertheless, Applicant hereby petitions provisionally for any extension of time, to the extent necessary to make this reply timely filed. Throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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